

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

versus

CHALMER DETLING, II

Criminal Action No.:
1:18-CR-00309-LMM-LTW-1

MOTION IN LIMINE TO EXCLUDE EVIDENCE

COMES NOW, the Defendant, Chalmer Detling, II, and hereby moves, *in limine*, for the exclusion of specific and highly prejudicial evidence from trial. Specifically, Mr. Detling moves to exclude any evidence of “crimes, wrongs, or other acts” under Federal Rule of Evidence 404(b).

The pretrial scheduling order in this case requires that the government provide notice of its intention to introduce evidence of “crimes, wrongs, or other acts” pursuant to Rule 404(b) “as soon as practicable after the government has determined to use such evidence” but no later than fourteen days before trial if the alleged acts occurred within the Northern District of Georgia and twenty-one days before trial if the alleged acts occurred outside of the district. (Doc. 15 at 6-7). As these deadlines have not yet been reached and Mr. Detling has not received any such notice from the government, Mr. Detling preserves an objection to the admission of any Rule 404(b) evidence.

Additionally, Mr. Detling moves to exclude any evidence of “crimes, wrongs or other acts” that the government intends to argue are exceptions to Rule 404(b) because they are either: (1) part of the same transaction or series of transactions as the charged offense, (2) necessary to complete the story of the crime, or (3) inextricably intertwined with the evidence regarding the charged offense.

Dated: This 17th day of August, 2021.

Respectfully Submitted,

/s/ Caitlyn Wade

Caitlyn Wade

Georgia Bar No. 259114

s/ Suzanne Hashimi

Suzanne Hashimi

State Bar No. 335616

Attorneys for Mr. Detling